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September 8, 2022

**BY ECF**

The Honorable Katherine P. Failla  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2103  
New York, NY 10007

**MEMO ENDORSED**

Re: Maddy v. Hallmark Cards, Inc., 1:22-cv-05249  
**Consent Letter Motion to Adjourn Initial Pretrial Conference**

Dear Judge Failla:

We represent Defendant Hallmark Cards, Inc. (“Defendant”) in the above captioned matter. We respectfully submit this letter to request that the Court adjourn the Initial Pretrial Conference currently set for September 15, 2022 at 4:00 pm. Mars Khaimov, counsel for Plaintiff Veronica Maddy, has consented to this request.

On June 27, 2022, the Court issued an order setting the Initial Pretrial Conference for September 15, 2022. *See* Dkt. 5. On August 11, 2022, Plaintiff submitted an executed waiver of service, thereby establishing September 26, 2022 as the deadline by which Defendant must respond to the complaint. *See* Dkt. 6. Therefore, Defendant requests, and Plaintiff consents, that the Court adjourn the presently scheduled Initial Pretrial Conference to a date after Defendant’s current deadline to respond to the complaint.

This is the first request to adjourn the Initial Pretrial Conference and no other extensions of any deadline have been requested in this matter. The Parties will continue their discussions throughout this period, and agree that adjournment of this deadline will promote judicial efficiency and facilitate their good faith efforts to resolve this matter without further burdening this Court’s time and resources.

Defendant therefore requests, and Plaintiff consents, that this Court adjourn the presently scheduled Initial Pretrial Conference until a date after Defendant’s deadline to respond to the complaint.

Respectfully submitted,

/s/ Joseph M. Sanderson  
Joseph M. Sanderson

cc: All counsel of record, via ECF

Application GRANTED. The initial pretrial conference scheduled for September 15, 2022, is hereby ADJOURNED to **October 14, 2022, at 3:00 p.m.** The Clerk of Court is directed to terminate the pending motion at docket number 7.

Dated: September 9, 2022 SO ORDERED.  
New York, New York



HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE